

Copy of this letter only to:
① Dean
Meyer & Glitzenstein ② Jane Burke
1601 Connecticut Avenue, N.W. ③ Steve C.
Suite 450
Washington, D.C. 20009-1035

Send package to:
Arizona - FJ

Katherine A. Meyer
Eric R. Glitzenstein
Kimberley K. Walley
Howard B. Crystal

D.J. Schubert
(Wildlife Biologist)

John Rogers, Director
United States Fish and Wildlife Service
1849 C Street, N.W.
Washington, D.C. 20240

Telephone (202) 585-5206
Fax (202) 585-5049

REGION 2	
RD	
END	X
GM (G/L)	
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PROCESSED
OCT 12 1996

FIVE

September 27, 1996

Re: The Affect of Air Force Activities on the Barry M.
Goldwater Range On the Sonoran Pronghorn

Dear Director Rogers,

We are writing on behalf of Defenders of Wildlife ("Defenders") to express our concerns regarding the affects of ongoing military activities at the Barry M. Goldwater Air Force Range ("Goldwater Range") on the endangered Sonoran Pronghorn. In response to Defenders' 60-day notice letter alleging several separate violations of the ESA by the Air Force -- including Section 9 and Section 7 -- on September 3, 1996 the Air Force sent the Fish and Wildlife Service ("FWS" or "Service") a Biological Assessment ("BA") addressing this issue. The BA concludes that military activities on the Goldwater Range are not likely to adversely affect the species. Based on the BA, the Air Force has asked the FWS to concur with this conclusion, which would end formal consultation before it has begun. Defenders has since filed a lawsuit against the Air Force on this matter, Defenders of Wildlife v. Sheila Widnall, C.A. No. 96-2117 (D.D.C.).

Several expert biologists familiar with the pronghorn situation on the Goldwater Range have analyzed this BA, and find it deficient in numerous respects. Attached to this letter is a submission from Dennis A. Hosack, P.h.D., a Conservation Biologist at Defenders who has studied this issue closely. In addition, Christine Maher, P.h.D., a professor at Montana State University, is sending a submission under separate cover. These scientists agree that the BA is inadequate, and cannot form the basis for a conclusion that military activities are not adversely affecting the pronghorn. Although the Air Force has known of Dr. Maher and Dr. Hosacks's concerns regarding these matters, it conspicuously failed to consult these two biologists in preparing the BA, as required by 50 C.F.R. § 402.12(f)(2).



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FWS - Region 8

OCT - 1 '96

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John Rogers
September 27, 1996
Page 2

Based on all the evidence concerning the affects the Air Force's activities are having on this extremely imperilled species, the only reasonable conclusion the Service can reach is that ongoing military activities on the Goldwater Range are jeopardizing the continued existence of the pronghorn in violation of Section 7 of the Endangered Species Act, 16 U.S.C. § 1536. Consequently, we urge the FWS to reject the Air Force's request that the Service concur with the BA's "no adverse affect" conclusion, and to render a jeopardy opinion at the conclusion of formal consultation.

Sincerely,



Howard B. Crystal



Katherine A. Meyer

cc: Nancy Kaufman, FWS Region 2, Regional Director
Bruce Palmer, FWS Arizona Ecological Services, Section Coordinator for Birds and
Mammals
Bill Austin, FWS Arizona Ecological Services, Fish and Wildlife Biologist
Col. David L. White, Luke USAF Base, Director of Range Management
(without attachments)



FISH AND WILDLIFE SERVICE

DO NOT REMOVE THIS SLIP FROM CORRESPONDENCE

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OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages - 4

To	Donna	From	Judy
Dept./Agency	Key word	Phone #	None
Fax #	ARIZONA	Fax #	
NSN 7540-01-317-7368		3099-101	
GENERAL SERVICES ADMINISTRATION			

SEP 19 '98

ACTION CODES

- | ACTION CODES | |
|----------------------------|--------------------------------|
| 0 - Prepare Draft Reply | 4 - Signature |
| 1 - Prepare Reply | 5 - For Information |
| 2 - For Appropriate Action | 6 - Revise |
| 3 - Surname | 7 - Obtain Additional Surnames |
| | 8 - Other - See Comments |
| | 9 - Mail/Distribute |

EXPEDITE

731

DEPARTMENT OF THE INTERIOR
TASKING PROFILE

Date Printed: 09/17/96

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Received Date -----	Document Date -----	Due Date -----	Action Office -----	Action Required -----
09/17/96	09/12/96	10/03/96	(FWS)	DR

Addressee: Secretary Babbitt

From: Ringer, June

129 East Fairview Avenue, Apt. 2
Glendale, CA

Subject Text: Opposes the Air Force's continued use of the Sonoran Desert for bombing practice. The bombing jeopardizes the endangered Sonoran pronghorn antelopes. Ltr referred from CEQ(Umhofer) for DR. Please provide ES with a copy of response.

Recommended Surnames:

Copies To: ES:PL

Cross-Reference:

Special Interest:

Special Interest Id:

SRO ---	Analyst -----	ES Phone -----	Source -----
RLBURCH	RBURCH	208-3569	PM

EXPEDITE

EXECUTIVE OFFICE OF THE PRESIDENT
COUNCIL ON ENVIRONMENTAL QUALITY

TO: JULIE FAULKNER

FROM: Peter Umhofer

DATE: 9/16/96

FAX: 219-2100

Number of pages including cover: 2

COMMENTS: PLEASE RESPOND DIRECTLY. THANKS.



PHONE (202) 456-6224 FAX: (202) 456-2710
OLD EXECUTIVE OFFICE BUILDING, ROOM 360
WASHINGTON, D.C. 20501

September 12, 1996

SEP 16 1996

SEP 16 1996

Kathleen A. McGinty, Director
White House Office on Environmental Policy
360 Old Executive Bldg.
Washington, DC 20501

Dear Director McGinty:

Please oppose and work to stop the U.S. Air Force's continuing bombing in southwestern Arizona's Sonoran Desert that jeopardizes the endangered Sonoran pronghorn antelopes.

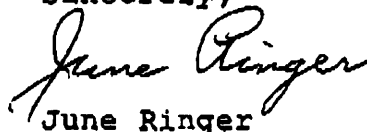
There are only about 420 to 550 of these Sonoran pronghorn left. Between about 120 and 250 of these endangered animals survive in the United States, and Mexico has a population of about 300.

I am outraged that the U.S. Air Force acts as if it is not covered by the Endangered Species Act, nor responsible to the vast majority of taxpayers who support the protection of endangered species.

The U.S. Air Force should immediately end its low-level supersonic flights and bomb practice in areas where the endangered Sonoran pronghorn may be present. This species' population is so low and vulnerable that even a few accidental deaths at the hands of the U.S. Air Force would be ecologically, legally, and morally irresponsible.

Thank you very much for considering my input.

Sincerely,



June Ringer

129 East Fairview Avenue, Apt. 2
Glendale, CA 91207